



November 16, 2016

Thomas Fitzpatrick, Esq.  
500 Fifth Avenue  
New York, NY 10110

Dear Tom:

Guidepost Solutions respectfully submits this bail security plan for your client Dan Zhong, in connection with his pending matter in the Eastern District of New York.

Guidepost is a global security company based in New York, and led by Bart Schwartz, Donna Bucella, Andrew O'Connell, Joseph Jaffe, and myself, all former federal prosecutors. In addition, many of our colleagues here at Guidepost are former federal agents (FBI/DHS ICE(HSI)/Secret Service). We have provided bail security for defendants in state and federal courts, including for the Eastern District of New York and the Southern District of New York.

We understand that you will be asking the Court to release Mr. Zhong to home confinement at his residence (the "Residence") in New Jersey, as part of a bail package. Guidepost will provide the security oversight that may be required for home confinement, as set forth more fully below.

### **The Residence**

The Residence is located at [REDACTED]. We have walked the premises, taken photos, and conducted a security assessment. The Residence is a 3,500 square-foot, bi-level house, with an attached one-car garage, located on 1/3 of an acre lot, with fencing to the sides and rear. For entry and exit there is the garage, a front door, and three sliding doors at the rear (two on the second floor to a deck, and one on the first floor to a patio). There are also several windows on each floor.

Living at the Residence are Mr. Zhong's wife and minor daughter, and his wife's parents. Family members living out of the home at this time are his adult daughter, and adult son, both away attending college.

### **Security Plan**

To secure Mr. Zhong at the Residence, ensure his appearance in court, prevent his flight from the jurisdiction of the United States, and ensure his compliance with all conditions of release, Guidepost will provide two armed security professionals, who are former or off-duty law enforcement officers, 24-hours per day, seven days per week, in two, 12-hour shifts each day, for as long as required by the Court. When Mr. Zhong is permitted to leave the Residence for pre-

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Suite 520  
Washington, DC 20036



approved court, lawyer, and medical visits, or for any other purpose the Court shall allow, we will have a third security professional join the security team as driver in a security vehicle provided by Guidepost. A fourth security professional will remain behind at the Residence to maintain a secure environment until Mr. Zhong returns. We will also have an off-site supervisory security professional overseeing and scheduling the security detail, and communicating with the Government and Pretrial Services, as needed, and available/on-call at all times, day and night.

We will install security technology, including alarms, sensors, cameras, and lights, as needed throughout the interior and exterior of the Residence, including on doors and windows, to further secure Mr. Zhong at the Residence.

If necessary, Guidepost security professionals will use reasonable, legal force, as deemed appropriate by Guidepost security professionals, to prevent Mr. Zhong from fleeing the jurisdiction of the United States or otherwise violating the terms of his release.

We will provide the Government with the credentials of our security team before the work begins and throughout, and a schedule of the security team on a weekly basis. Mr. Zhong will not be involved in or informed of the composition of the Guidepost security detail at any given time.

If needed, we will provide interpreter services to communicate with Mr. Zhong and monitor his communications with other people at the Residence, to ensure compliance with all terms of his release and for his safety.

Only phones and other electronic communication devices approved by the Court in advance will be permitted in the Residence.

Only residents and visitors approved by the Court will be permitted entry into the Residence. We will maintain a daily visitors log and transmit that log on a daily basis to the Government. All approved visitors, except for counsel, entering the Residence will be searched by our security detail and will temporarily surrender to Guidepost all computers, cell phones, or other electronic communication devices, and all travel documents, for the duration of their visit to the Residence. No approved visitor, except for counsel, will be permitted to enter the Residence if he or she is carrying over \$200. No approved visitor will be allowed entry if he or she is carrying identification documents in a name other than his or her own. All approved visitors, except counsel, will be screened with a metal detector and have their bags searched before entry into the Residence. The Residence, Mr. Zhong, and other residents and visitors, except counsel, will be subject to random, unannounced physical and electronic searches conducted by Guidepost.

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### **Fees and Expenses**

Our professional fees will be based on an hourly rate for each security professional, plus any applicable state sales tax. We will also bill you for necessary expenses, including:

- up-front costs for the security technology (alarms, sensors, cameras, etc.);
- monthly/annual costs for outside security monitoring;
- transportation (security vehicle rental and parking), plus fuel and tolls; and
- translation services (if needed).

We request an initial, up-front retainer payment, and that our monthly invoices are paid within ten business days of receipt by you.

Please let me know if you have any questions or would like to discuss this plan further. We can begin immediately.

Sincerely,

/jmw/

Julie Myers Wood  
CEO  
Guidepost Solutions LLC

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Washington, DC 20036

TO: Clerk's Office  
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

FILED  
CLERK



2016 DEC -6 PM 12:31

APPLICATION FOR LEAVE  
TO FILE DOCUMENT UNDER SEAL

\*\*\*\*\*

USA

-v.-

Dan Zhong et al

16CR614

Docket Number

\*\*\*\*\*

SUBMITTED BY: Plaintiff Defendant ☒ DOJ

Name: Thomas Fitzpatrick

Firm Name: \_\_\_\_\_

Address: 507 Fifth Avenue

N.Y. N.Y. 10010

Phone Number: 212-730-9690

E-Mail Address: tfitzpatrick@doj.gov

INDICATE UPON THE PUBLIC DOCKET SHEET: YES ☐ NO ☐

If yes, state description of document to be entered on docket sheet:

A) If pursuant to a prior Court Order:

Docket Number of Case in Which Entered: 16mja1000  
Judge/Magistrate Judge: Steven L. Tiscione  
Date Entered: 11/22/16

B)  
If a new application, the statute, regulation, or other legal basis that  
authorizes filing under seal

ORDERED SEALED AND PLACED IN THE CLERK'S OFFICE,  
AND MAY NOT BE UNSEALED UNLESS ORDERED BY  
THE COURT.

DATED: \_\_\_\_\_, NEW YORK

U.S. DISTRICT JUDGE/U.S. MAGISTRATE JUDGE \_\_\_\_\_

RECEIVED IN CLERK'S OFFICE \_\_\_\_\_ DATE

**MANDATORY CERTIFICATION OF SERVICE:**

A.) ☒ A copy of this application either has been or will be promptly served upon all parties to this action, B.) ☐ Service is excused by 31 U.S.C. 3730(b), or  
by the following other statute or regulation: \_\_\_\_\_; or C.) ☐ This is a criminal document submitted, and flight public safety, or security are significant  
concerns. (Check one)

DATE

12/5/16

SIGNATURE

Thomas Fitzpatrick